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**UNITED STATES DISTRICT COURT**  
**FOR THE NORTHERN DISTRICT OF CALIFORNIA**  
**SAN FRANCISCO DIVISION**

ELECTRONIC FRONTIER FOUNDATION, )  
 )  
Plaintiff, )  
 )  
v. )  
 )  
UNITED STATES DEPARTMENT )  
OF JUSTICE, )  
 )  
Defendant. )

Case No. 16-cv-02041-HSG

**STIPULATION AND ORDER TO  
EXTEND DEADLINE FOR FILING  
PLAINTIFF'S REPLY**

The parties stipulate and respectfully request the Court extend the deadline for filing Plaintiff's Reply in Support of its Motion for Partial Summary Judgment until November 28, 2016. Good cause exists for this request as follows:

1. The Department of Justice (the "Department") filed its Reply in Support of its Motion for Partial Summary Judgment and Opposition to Plaintiff's Cross Motion for Partial Summary Judgment on November 3, 2016.

2. After reviewing the agency's brief, Plaintiff contacted the Department by email on November 7, 2016 to discuss narrowing Plaintiff's request and, thus, further reducing the matters in dispute in this litigation.

3. By email to Plaintiff on November 11, 2016, the Department represented that it would require additional time to discuss the proposed narrowing, both internally and with other affected government agencies. Thus, the Department did not expect it could provide a full response before the filing of Plaintiff's Reply brief, currently scheduled for November 17, 2016.

4. To allow for further discussions between the parties before the filing of Plaintiff's Reply, the parties agreed that the deadline for filing should be extended.

Accordingly, the parties respectfully request the Court extend the deadline for the filing of Plaintiff's Reply until November 28, 2016.

DATED: November 14, 2016

/s/ Mark Rumold  
Mark Rumold

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DATED: November 14, 2016

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**DECLARATION PURSUANT TO LOCAL RULE 5-1(I)(3)**

Pursuant to Civil L.R. 5-1(i)(3), I, Mark Rumold, declare that I obtained the concurrence of Rodney Patton, counsel for Defendant, United States Department of Justice, in the filing of this document.


I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct. Executed this 14th day of November, 2016 in San Francisco, California.

/s/ Mark Rumold  
Mark Rumold

Upon consideration of the parties' stipulation concerning an extension of time in which to file a Plaintiff's Reply, it is:

**ORDERED** that plaintiff's deadline to file its Reply is extended to November 28, 2016.

DATED: November 14, 2016

  
HON. HAYWOOD S. GILLIAM, JR.  
DISTRICT COURT JUDGE